

From: ["Bray, Dave" <Bray.Dave@epa.gov>](mailto:Bray.Dave@epa.gov)  
To: ["Ken Merrill" <kmerrill@kalispeltribe.com>](mailto:kmerrill@kalispeltribe.com)  
Date: 3/27/2017 12:58:46 PM  
Subject: RE: Kalispel draft FAQ for Class I redeg

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Hi Ken,

This looks pretty good except for #6 as you correctly surmised.

I suggest something along the lines of:

6. What pollutants are addressed by the PSD area classification system?

The PSD program currently regulates three pollutants under the PSD area classification system: sulfur dioxide, nitrogen dioxide, and particulate matter. For these three pollutants, PSD "increments" have been established for Class I, II, and III areas which define the allowed amount of degradation.

The only other thing you should be prepared to discuss is the fact that the Prevention of Significant Deterioration program is intended to ensure that degradation of airsheds doesn't exceed the applicable increments as a result of increases in emissions from all sources, not just new major stationary sources and major modification.

Yes, only new major stationary sources and major modifications to existing major stationary sources get upfront review of increment consumption as part of their preconstruction permit, but increases in emissions from other sources (minor stationary sources, area sources, mobile sources) can still consume increment. EPA's rules require a periodic review of increment consumption to see if it has been exceeded, and if so, then the responsible air authority is supposed to come up with a plan to reduce emissions from the increment consuming sources. Few, if any, States have done those periodic reviews because it is believed that increments are not being exceeded. In general, emissions from minor, area, and mobile sources have been decreasing as a result of EPA's national regulations under the mobile source program and national emission standards under sections 111 and 112 of the Act, so it is unlikely that increment exceedances would be found. However, it is still part of the PSD program that can be used to ensure that the airshed doesn't degrade significantly. For example, the Kalispel Tribe could periodically look at the area surrounding the Reservation (say out to 50 km) to see if there have been significant changes in emissions, and if so, could do a modeling analysis to assess how much of the Class I increment has been consumed or expanded since the minor source baseline date.

Hope this helps and, as always, let me know if you have any further questions or want to discuss this further.

Dave

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From: Ken Merrill [mailto:[kmerrill@kalispeltribe.com](mailto:kmerrill@kalispeltribe.com)]  
Sent: Saturday, March 25, 2017 1:00 PM  
To: Bray, Dave <[Bray.Dave@epa.gov](mailto:Bray.Dave@epa.gov)>  
Subject: Kalispel draft FAQ for Class I redeg

Hi David,

10/11/2018

We are trying to help prevent some of the misinformation rhetoric we are hearing. Could you take a quick look at the attached FAQ and see if we might be misleading anyone in the FAQ. We are trying to send it to the County before Wednesday

Thanks --Ken

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